

1 THE HONORABLE JAMES ROBART

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 FRED and KATHLEEN STARK, a
married couple,

Case No. CV 06-1719 JLR

12 Plaintiffs,

13 vs.

DECLARATION OF GARTH D.
WOJTANOWICZ IN SUPPORT OF
PLAINTIFFS' CONSOLIDATED
RESPONSE TO DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGMENT

14 THE SEATTLE SEAHAWKS,
15 FOOTBALL NORTHWEST, LLC, a
Washington limited liability company,
16 FIRST & GOAL, INC., a Washington
corporation, THE WASHINGTON STATE
PUBLIC STADIUM AUTHORITY, a
17 Washington municipal corporation, and
LORRAINE HINE, in her capacity as chair
18 of the Washington State Public Stadium
Authority board of directors,

Noted for May 18, 2007

19 Defendants.
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21 I, Garth D. Wojtanowicz declare as follows:

22 1. I am an attorney for plaintiffs in this action. I have personal knowledge of each
23 fact stated in this declaration.

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DECLARATION OF GARTH D.
WOJTANOWICZ IN SUPPORT OF
PLAINTIFFS' CONSOLIDATED
RESPONSE TO DEFENDANTS' MOTIONS
FOR SUMMARY JUDGMENT - 1

CV 06-1719 JLR

LAW OFFICES
DANIELSON HARRIGAN LEYH & TOLLEFSON
LLP
999 THIRD AVENUE, SUITE 4400
SEATTLE, WASHINGTON 98104
TEL. (206) 623-1700 FAX. (206) 623-8717

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the deposition of Ann Kawasaki-Romero dated April 25, 2007 and exhibits 27, 29, 30, 31, 32 and 36 thereto.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the deposition of the Public Stadium Authority 30 (b)(6) designee Ann Kawasaki-Romero dated April 25, 2007.

4. Attached hereto as Exhibit 3 is a true and correct copy of Answer of Defendants the Washington State Public Stadium Authority and Lorraine Hine dated January 9, 2007.

5. Attached hereto as Exhibit 4 is a true and correct copy of Answer of the Seattle Seahawks, Football Northwest LLC, and First & Goal, Inc. dated January 3, 2007.

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the Deposition of Martha Fuller dated April 30, 2007 and exhibits 58, 59 and 60 thereto.

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the deposition of Lorraine Hine dated April 27, 2007 and exhibit 55 thereto.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Declaration of Fred Stark dated November 27, 2006.

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the deposition of Milton Ahlerich dated May 2, 2007.

I declare under penalty of perjury and the laws of the State of Washington that the foregoing is true and correct.

Executed this 8th day of May, 2007, at Seattle, Washington.

DANIELSON HARRIGAN LEYH & TOLLEFSON LLP

By



Garth D. Wojtanowicz, WSBA #30822

**DECLARATION OF GARTH D.
WOJTANOWICZ IN SUPPORT OF
PLAINTIFFS' CONSOLIDATED
RESPONSE TO DEFENDANTS' MOTIONS
FOR SUMMARY JUDGMENT - 2**

CV 06-1719 JLR

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I declare under penalty of perjury of the laws of the State of Washington that on May 8, 2007, I caused to be served a copy of this document upon the following:	
Tim J. Filer / Jeffrey Miller Foster Pepper LLC 1111 Third Ave., Suite 3400 Seattle, WA 98101-3299	<input type="checkbox"/> Legal Messenger <input type="checkbox"/> By Mail <input type="checkbox"/> By Facsimile (206) 447-9700 <input checked="" type="checkbox"/> By E-Mail FileT@Foster.com MILJE@Foster.com howej@foster.com
Stephen T. Janik / John Dunbar Ball Janik LLP One Main Place 101 SW Main St, Suite 1100 Portland, OR 97204	<input type="checkbox"/> Legal Messenger <input type="checkbox"/> By Mail <input type="checkbox"/> By Facsimile (503) 295-1058 <input checked="" type="checkbox"/> By E-Mail sjanik@balljanik.com jdunbar@bjllp.com ismith@bjllp.com lpjordan@balljanik.com
Paul A. Ainsworth Gregg H. Levy Covington & Burling LLP 1201 Pennsylvania Ave., NW Washington, DC 20004-2401	<input type="checkbox"/> Legal Messenger <input type="checkbox"/> By Mail <input type="checkbox"/> By Facsimile (202) 662-6291 <input checked="" type="checkbox"/> By E-Mail painsworth@cov.com glevy@cov.com
 D. Yvette Chambers	

**DECLARATION OF GARTH D.
 WOJTANOWICZ IN SUPPORT OF
 PLAINTIFFS' CONSOLIDATED
 RESPONSE TO DEFENDANTS' MOTIONS
 FOR SUMMARY JUDGMENT - 3**

CV 06-1719 JLR

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